

Exhibit K

From: Miazad, Ossai <om@outtengolden.com>
Sent: Friday, March 30, 2018 12:45 PM
To: Engelman, Keri L.; Evans, Paul C.; Catanzaro, Vincent M.
Cc: Bentley, Cheryl-Lyn; McNerney, Christopher; Schrum-Herrera, Cristina; Michael Pope; Eric Eingold; Stromberg, Daniel
Subject: RE: Millien et al v. The Madison Square Garden Company et al - discovery issues
Attachments: 1384782_1.pdf; 2018-03-29 Subpoena for Test. - Kelly Larry.pdf

Keri,

We appreciate that Paul is on vacation, but as you know we have raised these issues with you weeks, if not months, ago and have repeatedly sought responses, well before Paul's absence from the office. As a matter of professional courtesy we will hold off on filing anything with the Court this week. We do, however, ask for your response early in the week, next week.

I have also attached a deposition notice for David Weiss and a subpoena for Larry Kelly. We ask that you prioritize production of their responsive ESI and produce a week prior to their scheduled depositions. We also ask that prior to their deposition MSG produce any job descriptions pertaining to all positions held by either Mr. Kelly or Mr. Weiss, resumes, materials related to any training they have received relevant to the issues in the lawsuit, any documents they reviewed as part of their involvement in MSG's background check process, any documents in their employment files that in any way relates to their role and/or responsibilities in MSG's background check process.

Regards, Ossai

Ossai Miazad
646-825-9817

From: Engelman, Keri L. [mailto:keri.engelman@morganlewis.com]
Sent: Thursday, March 29, 2018 11:02 AM
To: Miazad, Ossai <om@outtengolden.com>; Evans, Paul C. <paul.evans@morganlewis.com>; Catanzaro, Vincent M. <vincent.catanzaro@morganlewis.com>
Cc: Bentley, Cheryl-Lyn <cbentley@outtengolden.com>; McNerney, Christopher <cmcnerney@outtengolden.com>; Schrum-Herrera, Cristina <Cschrumherrera@outtengolden.com>; Michael Pope <mpope@youthrepresent.org>; Eric Eingold <eingold@youthrepresent.org>; Stromberg, Daniel <dstromberg@outtengolden.com>
Subject: RE: Millien et al v. The Madison Square Garden Company et al - discovery issues

Ossai,

Thanks for the follow-up. As you know, Paul is out of the country this week, so we will revert on all of these issues by the end of next week.

Thanks,
Keri

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From: Miazad, Ossai [<mailto:om@outtengolden.com>]

Sent: Tuesday, March 27, 2018 6:11 PM

To: Engelman, Keri L. <keri.engelman@morganlewis.com>; Evans, Paul C. <paul.evans@morganlewis.com>; Catanzaro, Vincent M. <vincent.catanzaro@morganlewis.com>

Cc: Bentley, Cheryl-Lyn <cbentley@outtengolden.com>; McNerney, Christopher <cmcnerney@outtengolden.com>; Schrum-Herrera, Cristina <Cschrumherrera@outtengolden.com>; Michael Pope <mpope@youthrepresent.org>; Eric Eingold <eeingold@youthrepresent.org>; Stromberg, Daniel <dstromberg@outtengolden.com>

Subject: Millien et al v. The Madison Square Garden Company et al - discovery issues

[EXTERNAL EMAIL]

Paul and Keri:

There are a number of requests, including RFP Nos. 7 & 8, from Plaintiffs' First Set of Requests for Production served on September 6, 2017, for which MSG has only produced responsive documents pertaining to the two named plaintiffs. We need to know whether Defendant will produce responsive documents related to putative class members. This is an issue that the parties need to promptly get before the Court if Defendant stands on its objections.

As you know, Plaintiffs have pled claims under the FCRA covering the 5 year SOL. They are entitled to discovery for that period. We also need to hear from you on whether Defendant is limiting its responses and production to a shorter period and in particular for RFP Nos. 7, 8, 16, 17, 18, 26. On the applicant data, we requested that you supplement through March 1, 2018. We are also seeking applicant data for years 4-5 for the FCRA claims. We are preparing subpoenas for the three CRAs identified by MSG and will send those to you prior to serving.

Finally, in an email dated January 8 from Christopher, we attempted to reach agreement on the scope of discovery on a subset of Plaintiffs' requests (RFP Nos 12, 13, 14, 21, 23, 24, and 25) to the following:

- Documents regarding MSG's procedures and practices for running background checks. Here, we make this request with the understanding from the meet and confer that MSG may not have formal policy documents.
- Training manuals for MSG's evaluation of applicants' criminal histories;
- Handbooks and/or other written guidance discussing MSG's criminal history policies and procedures;
- Evaluations (however titled including, for example, audits, studies or investigations) of MSG's background check hiring process and efforts to comply with the laws at issue in this case (performed either by MSG or an outside vendor);
- Investigations by government agencies as to MSG's background check process;
- Complaints by class members as to MSG's consideration of criminal history as part of the hiring process (informal or formal); and
- Guidance, advice or legal opinions relied upon by MSG in crafting or revising its background check process.

During a subsequent meet and confer you agreed to provide a response in writing which we have now repeatedly requested, but have not received.

We have also repeatedly requested additional information from Defendant on the item noted in its privilege log and the basis for the privilege as it does not appear to be properly designated.

We need to hear back from you on these issues by Thursday March 29, otherwise we will have no choice but to seek prompt judicial intervention.

Regards, Ossai

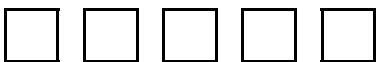


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